

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
v.)
AMIE ARESTANI,)
Defendant.)
Criminal No. 12-10027-WGY

JOINT MOTION TO CONTINUE SENTENCING

The government, by and through the undersigned attorney, and defendant Amie Arestani (“Arestani”) hereby file this joint motion to continue the sentencing hearing until after the conclusion of the trial in the above-captioned case. As grounds for this motion, the parties state as follows:

1. Arestani pled guilty to all counts in the above-captioned indictment on September 17, 2013. Arestani's plea agreement included a cooperation provision.
2. Arestani's sentencing is currently scheduled for September 30, 2013.
3. A trial is scheduled to commence in this case on October 28, 2013. The charges against three co-defendants in this case – Rudy Avalos, Adolfo Castilleja, and Carl Lindstrom – remain unresolved. Lindstrom is expected to plead guilty on October 7, 2013. No change-of-plea hearing has been scheduled for Avalos or Castilleja.
4. The Government anticipates calling Arestani to testify at any trial in this case. For that reason, the parties ask that this sentencing hearing be continued until after the anticipated conclusion of the trial. Moreover, the Government will need certain additional time after the conclusion of trial to evaluate whether, and to what extent, Arestani has provided substantial assistance, and both parties will need additional time to prepare for Arestani's sentencing hearing.

5. Accordingly, the parties move to continue Arestani's sentencing hearing and request that this Honorable Court re-schedule the sentencing hearing for November 19, 2013 or any subsequent date at the convenience of the Court. In the interim, the parties will apprise the Court of any changes in the status of this matter. (Co-defendant Dennis Brady's sentencing hearing recently was re-scheduled for November 18, 2013.)

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Linda M. Ricci
Linda M. Ricci
Assistant U.S. Attorney

Francis T. O'Brien, Jr., Esq.

/s/ Francis T. O'Brien, Jr.
Counsel for Amie Arestani

Dated: September 4, 2013

CERTIFICATE OF SERVICE

I, Linda M. Ricci, hereby certify that this document will be sent via ECF to all registered participants.

/s/ Linda M. Ricci
Linda M. Ricci
Assistant U.S. Attorney

Dated: September 4, 2013